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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 IN RE: FACEBOOK, INC. CONSUMER
12 PRIVACY USER PROFILE LITIGATION,

13 This document relates to:

14 ALL ACTIONS
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MDL NO. 2843

CASE NO. 3:18-MD-02843-VC-JSC

HON. VINCE CHHABRIA
HON. JACQUELINE SCOTT CORLEY
COURTROOM 4 – 17TH FLOOR
SPECIAL MASTER, DANIEL GARRIE, ESQ.

**PROTOCOL FOR TARGETED SEARCH
AND PRODUCTION OF ZUCKERBERG
AND SANDBERG CUSTODIAL
DOCUMENTS**

**PROTOCOL FOR TARGETED SEARCH AND PRODUCTION OF ZUCKERBERG AND
SANDBERG CUSTODIAL DOCUMENTS**

1. This order sets out the protocol for searching and producing documents from the custodial files of Mark Zuckerberg and Sheryl Sandberg (collectively the “Custodians”).

2. **Date Range.** The search and production of documents pursuant to this protocol is limited to documents dating from January 1, 2007 to December 31, 2019.

3. **Data Sources.** Facebook is to search all data sources that may contain communications of any kind to or from the Custodians, including but not limited to email, messaging applications, and applications that facilitate and track work related information. Additionally, Facebook is to search any data sources that may reasonably contain other relevant non-duplicative documents related to the Custodians, provided such searches would not be unduly burdensome.

4. Search and Production.

a. After the deadline for substantial discovery, Facebook is to search the data sources set out in paragraph 3 above for relevant non-duplicative communications and documents related to the Custodians using search strings and methodologies Facebook believes are appropriate.

b. No later than 20 business days after the deadline for substantial discovery, Facebook is to provide a statistically significant sample of the results of the search and a list of the search strings used to Special Master Garrie and Plaintiffs.

c. No later than three business days from receiving the sample from Facebook, Plaintiffs may submit to Special Master Garrie and Facebook and list of proposed additional search strings, including a one sentence explanation as to why Plaintiffs believe each search string should be added.

d. No later than three business days from receiving Plaintiffs' list of proposed search strings, Facebook may submit to Special Master Garrie and Plaintiffs any objections Facebook may have to the proposed search strings, including a one sentence

1 explanation as to why each search string should not be included.

- 2 e. Special Master Garrie may hold a hearing or request briefing from the parties to
3 resolve any disputes as to search strings and may add or remove search strings or
4 delimiters at his discretion. Special Master Garrie will then provide the parties a final
5 list of search strings.
- 6 f. Facebook is to search the data sources using the final search strings provided by
7 Special Master Garrie.
- 8 g. No later than 40 business days after the deadline for substantial discovery, Facebook
9 is to provide to Plaintiffs the results of the search, minus any nonresponsive,
10 privileged, or duplicative communications or documents.
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12 5. **Disputes.** Any disputes with respect to the execution of this protocol are to be handled
13 pursuant the Discovery Protocol.
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16 **IT IS SO ORDERED.**

17 January 19, 2022



18 Daniel Garrie
19 Discovery Special Master
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